

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,)	
)	DEFENDANT TRAVIS KYLE MAYER'S
Plaintiff,)	RESPONSE TO GOVERNMENT'S
)	MOTION TO PRECLUDE ARGUMENT
vs.)	TO ELICIT JURY NULLIFICATION
)	
Travis Kyle Mayer,)	
)	Crim. No. 19-96 (WMW/HB)
Defendant.)	

The Government has moved the Court to preclude argument “to elicit jury nullification” [Doc. No. 166]. Assuming this request does not seek to bar argument to elicit a “not guilty” verdict, Defendant has no objection. As to the request to bar evidence and “lines of inquiry” designed to elicit the same, the Government will have to be content to live with the restrictions set forth in the Federal Rules of Evidence. If the Government believes a “line of inquiry” (whatever that means) is not relevant, it is free to object.

Dated: 7 June 2021

Respectfully submitted,

DANIEL L. GERDTS, LAWYER

s/ Daniel L. Gerdt's

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